

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

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KAITLIN E. WALSH, on behalf of herself, and :
all other plaintiffs known and unknown, :
: Plaintiff, :
: Civil Action No. 12-cv-05038
-v- :
: :
“SIX FLAGS ENTERTAINMENT CORPORATION” :
D/B/A SIX FLAGS GREAT AMERICA, :
: Defendant. :
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**JOINT MOTION FOR EXTENSION OF TIME
FOR PARTIES TO FILE AN AGREED MOTION FOR
PRELIMINARY APPROVAL OF CLASS SETTLEMENT**

Plaintiff Kaitlin E. Walsh and Defendant Great America, LLC (D/B/A “Six Flags Great America”), sued as Six Flags Entertainment Corporation, D/B/A Six Flags Great America, (collectively the “Parties”) respectfully and jointly move this Court for entry of an Order granting it an extension of time up to, and including, June 19, 2013 by which the parties must file an agreed motion for preliminary approval of a class settlement. In support of this Motion, the Parties state:

1. This Motion is brought prior to the expiration of the time this Court ordered the Parties to file an agreed motion for preliminary approval of a class settlement.
2. The current deadline for the Parties to file an agreed motion for preliminary approval of a class settlement is currently May 15, 2013.
3. The Parties jointly request this extension.
4. The Parties have not previously requested any extension of time to file an agreed motion for preliminary approval of a class settlement.
5. To date, the Parties have exchanged extensive discovery for the purposes of

settlement, including the number of putative class numbers and applicable hours worked, walking time and distances throughout the park, park procedures, numerous declarations, and initial damages models. The parties are actively working together in hopes of achieving settlement but require more time to process the information exchanged.

For all the reasons stated above, the Parties respectfully request that this Court enter an Order granting it an extension of time up to and including June 19, 2013, to file an agreed motion for preliminary approval of a class settlement.

Dated: May 2, 2013

Respectfully submitted,

By: /s/ John W. Billhorn

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